

The Nation's Voice for People with Hearing Loss

December 8, 2017

Via electronic filing

Marlene H. Dortch, Secretary Office of the Secretary Federal Communications Commission 445 12th Street, S.W., Rm TW-A325 Washington, D.C. 20554

Re: Notice of *Ex Parte*

Revisions to Reporting Requirements Governing Hearing Aid-Compatible Mobile

Handsets WT Docket No. 17-228, 17-123

Dear Ms. Dortch:

On December 5, 2017 Lise Hamlin of Hearing Loss Association of America (HLAA), Linda Kozma-Spytek of the DHH Tech RERC at Gallaudet University met with Federal Communications Commission's (Commission) Wireless Telecommunications Bureau staff Garnet Hanley, Eli Johnson, Jonathan Lechter, Weiren Wang, and Michael Rowen, and Consumer and Governmental Affairs Bureau staff Karen Peltz Strass and Susan Bahr to discuss the NPRM in the above referenced docket.

HLAA and the Gallaudet RERC reiterated Comments filed by Consumer Groups (HLAA, TDI, NAD, DHHCAN and Gallaudet RERC), in the docket: we are convinced the best way to get accurate and complete information to consumers and the Commission about HAC (Hearing Aid Compatible) handsets available by Service Providers and to understand whether all hearing aid compatibility requirements are being met currently by Service Providers is via the annual HAC reports all Service Providers file directly with the Commission.

In our filing, Consumer Groups noted that our review of Non-Tier I Service Providers' websites leads us to believe that the annual reports filed with the Commission are currently the only way to get an accurate and complete picture of HAC offerings. When we reviewed Non-Tier I websites, we found that it is often difficult to find information about hearing aid compatibility in general as well as which handsets have specific HAC ratings. In addition, the websites may contain misleading information about their HAC inventory in contrast to the reports filed with the Commission. We noted that in-store testing by consumers has historically been hit or miss and that depending on consumer complaints to determine compliance would not yield a full or accurate picture of compliance.

However, Consumer Groups are not unsympathic to the pleas of non-Tier I Service Providers who have expressed concerns about the burden of filing these reports. Consumer Groups



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reiterated our suggestion that we sit down with both Tier 1 and non-Tier I Service Providers and the Commission to find ways to streamline these reports. In addition, we discussed ways to ensure that the websites of all Service Providers reflect accurate, complete and up to date information about their HAC offerings. Our goal is to ensure consumers have access to essential information, while at the same time easing any unnecessary reporting burden that Service Providers experience in fulfilling this requirement.

Respectfully submitted,

/s/ Lise Hamlin Director of Public Policy